



NEWMARK
STORMS
DWORAK^{LLC}
T R I A L L A W Y E R S

222 South 9th Street Suite 470
Minneapolis, MN 55402
p: 612-455-7050
f: 612-455-7051
www.newmarkstorms.com

September 18, 2023

Via ECF

Hon. Douglas L. Micko
United States District Court
316 N. Robert Street
St. Paul, MN 55101
micko_chambers@mnd.uscourts.gov

Re: *Wells v. Hanneman*, No. 23-cv-273 (WMW/DLM)

Your Honor,

I write with permission from your Chambers and on behalf of Plaintiffs jointly with Defendants regarding Defendants' Motion to Stay Discovery. Although Defendants' motion and memorandum seeks a stay of all discovery on their face, the parties previously agreed and agree now that Defendants are only seeking a stay of discovery from Defendants. Defendants are **not** seeking a stay of discovery that prevents Plaintiffs from seeking discovery from third parties via subpoena. Plaintiffs have begun seeking discovery from third parties and intend to continue doing so.

Respectfully submitted,

/s/ Jeffrey S. Storms

c: Counsel of Record